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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

FILED
08 FEB 28 AM 9:25

UNITED STATES OF AMERICA,

Plaintiff,

v.

Luis Alberto CASILLAS-Ramirez

Defendant,

Magistrate Case No. _____

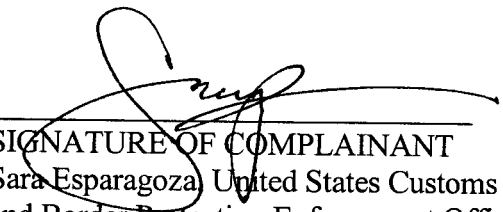
COMPLAINT FOR VIOLATION OF

Title 8, U.S.C., Section 1324(a)(2)(B)(iii)
Bringing in Illegal Alien(s)
Without Presentation

The undersigned complainant being duly sworn states:

On or about **February 27, 2008**, within the Southern District of California, defendant **Luis Alberto CASILLAS-Ramirez**, with the intent to violate the immigration laws of the United States, knowing and in reckless disregard of the fact that aliens, namely, **Bardomiano RAMOS-Ayala, Oracio MORALES-Trinidad, and Jose Arturo Morales-TREJO**, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said aliens, and upon arrival did not bring and present said aliens immediately to an appropriate immigration officer at a designated port of entry; in violation of Title 8, United States Code, Section 1324(a)(2)(B)(iii).

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.


SIGNATURE OF COMPLAINANT
Sara Esparagoza United States Customs
and Border Protection Enforcement Officer

Sworn to before me and subscribed in my presence, this **28th** day of **February, 2008**.


UNITED STATES MAGISTRATE JUDGE

PROBABLE CAUSE STATEMENT

The complainant states that **Bardomiano RAMOS-Ayala, Oracio MORALES-Trinidad, and Jose Arturo Morales-TREJO**, are citizens of a country other than the United States; that said aliens have admitted they are deportable; that their testimony is material; that it is impracticable to secure their attendance at trial by subpoena; and that they are material witnesses in relation to this criminal charge and should be held or admitted to bail pursuant to Title 18, United States Code, Section 3144.

On February 27, 2008, at approximately 6:15 am, **Luis Alberto CASILLAS-Ramirez** (Defendant) made application for admission into the United States at the San Ysidro Port of Entry as the driver and sole visible occupant of a 2001 GMC Yukon. Defendant approached the inspection booth driving the vehicle and was next in line for inspection. A U.S. Customs and Border Protection (CBP) Officer was apprehending the driver of the vehicle being inspected in front of the Defendant's, when he observed Defendant getting out of the driver seat and running towards Mexico. The CBP Officer relayed over the radio and by yelling to other officers there was an absconder in lane twenty three. Defendant was apprehended by another CBP Officer and escorted along with the vehicle into secondary inspection for further investigation.

During secondary inspection, CBP Officers discovered ten human beings concealed in the rear cargo area of the vehicle covered with vehicle carpeting. A patdown search of the Defendant revealed a Laser Visa (DSP-150) not lawfully issued to the Defendant on his possessions.

Three individuals were retained as Material Witnesses and are now identified as **Bardomiano RAMOS-Ayala, Oracio MORALES-Trinidad, and Jose Arturo Morales-TREJO**.

During a video recorded interview, Defendant was advised of his Miranda Rights, acknowledged his rights and elected to answer questions without the benefit of counsel. Defendant admitted knowledge of the concealed aliens. Defendant admitted if successful in smuggling, the persons with whom he made arrangements would pay him \$2,000.00 USD.

During subsequent interviews Material Witnesses declared to be citizens of Mexico with no legal rights or documents to enter the United States. Material Witnesses stated they were each going to pay \$3,500.00 USD to be smuggled into the United States. Material Witnesses stated they indented to be smuggled into the United States and were going to California.